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June 30, 2025

VIA ECF  
The Honorable Alvin K. Hellerstein  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**Re: *Knight First Amendment Institute at Columbia University v. U.S. Department of State*, No. 23 Civ. 02513 (AKH)**

Dear Judge Hellerstein,

We write on behalf of Plaintiff the Knight First Amendment Institute at Columbia University and Defendant the U.S. Department of State to provide a status update in the above referenced Freedom of Information Act ("FOIA") lawsuit.

As the parties advised in their previous joint status reports, Defendant State Department has completed its processing of records in response to the Institute's FOIA request and Defendant provided Plaintiff with a draft Vaughn index and re-produced records with certain redactions removed in response to Plaintiff's request for additional information about certain withholdings. See ECF Nos. 32, 34, and 36.

Plaintiff is satisfied with Defendant's responses, and the parties agree that the only remaining issue is Plaintiff's request for an award of its reasonable attorney fees and other litigation costs as provided for in FOIA, 5 U.S.C. § 552(a)(4)(E). The parties are hopeful that fee negotiations will result in the settlement of this case without the need for further litigation. To allow the parties an opportunity to come to an agreement on this issue, the parties respectfully propose that the next joint status report be due by August 15, 2025, at which time they will inform the Court of the progress of their negotiations.

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We thank the Court for its attention to this matter.

/s/ Jennifer Jones

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